

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**
Case No.: 1:23-cv-20727-RKA

RYAN BRESLOW, et al.,

Plaintiffs,

v.

MARK PHILLIPS, et al.,

Defendants.

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE MEMORANDUM OF
LAW IN EXCESS OF THE PAGE LIMITATION SET OUT IN LOCAL RULE 7.1(c)**

Defendants Mark Phillips and Benjamin Reed (collectively, "Defendants"), respectfully request leave to file an Opposition to Plaintiffs' Motion for Preliminary Injunction that exceeds Local Rule 7.1(c)'s twenty-page limit. Defendants request leave to file a memorandum up to thirty-five pages in length. In support of this motion, Defendants state as follows:

1. Local Rule 7.1(c) authorizes the Court to grant leave to file a memorandum in excess of the twenty-page limit set forth in the Local Rule.
2. Defendants anticipate that they can adequately respond to Plaintiffs' Motion for a Preliminary Injunction in a memorandum of thirty-five pages in length.
3. Specifically, Defendants' memorandum will contain a detailed discussion of a voluminous record that includes cryptocurrency and blockchain transactions and the intricacies of the governance of a decentralized autonomous organization (DAO), a novel organizational governance structure. Further, Plaintiffs filed a thirty-four-page memorandum concurrent with an *ex parte* motion to do so. *See* ECF Nos. 4, 8. Defendants therefore request the opportunity to provide the Court with a comparable level of detail.

4. Defendants will make every effort to limit the length of their memorandum. Despite these good faith efforts, Defendants anticipate being unable to fully brief the issues in twenty pages or less. Thus, Plaintiffs respectfully request leave to exceed Local Rule 7.1(c)'s twenty-page limit.

5. Pursuant to Local Rule 7.1.A.3, the parties conferred and the Plaintiffs do not oppose the relief sought.

Dated: March 13, 2023

Respectfully submitted,

DHILLON LAW GROUP INC.

/s/ Matthew S. Sarelson
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** pro hac vice pending*

*Attorneys for Defendants Mark
Phillips and Benjamin Reed*

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all counsel of record in this action.

By: /s/ Matthew Sarelson
Matthew Sarelson